

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In re:

Revision of the Commission's Rules  
To Ensure Compatibility with Enhanced  
911 Emergency Calling Systems

CC Docket No. 94-102

RECEIVED

JUN 17 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Comments of ALLTEL Communications, Inc.

ALLTEL Communications, Inc. ("ALLTEL")<sup>1</sup> hereby submits its comments in the above-captioned docket matter pursuant to the Commission's recently released public notice soliciting targeted public comment on the wireless E-911 Phase II automatic location identification requirements ("ALI").<sup>2</sup>

While duly noting the Commission's request for targeted comments addressing the issues delineated in the Public Notice, ALLTEL is nonetheless constrained to initially focus on larger issues surrounding implementation of ALI technology. ALLTEL did not file a waiver request in response the Commission's earlier public notice<sup>3</sup>, largely because

<sup>1</sup> ALLTEL, along with its corporate affiliate, 360 Communications Company, are among the nation's largest providers of CMRS services. Both companies maintain analog and digital cellular facilities. ALLTEL also is the licensee of numerous 10 MHz PCS systems throughout the country.

<sup>2</sup> Public Notice, Wireless Telecommunications Bureau Requests Targeted Comment on Wireless E-911 Phase II Automatic Location Identification Requirements, DA 99-1049 (released June 1, 1999) (the "Public Notice").

<sup>3</sup> Public Notice, Wireless Telecommunications Bureau Outlines Guidelines for Wireless E911 Rule Waivers for Handset-Based Approaches to Phase II Automatic Location Identification Requirements, DA 98-2631 (released December 24, 1998.) While ALLTEL choose not file at waiver at that time, it reserves the right to file such a waiver at such time as it has information sufficient to fully address the showings required by the Commission.

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it did not believe the state of various ALI technologies had either evolved sufficiently or been subjected to sufficiently rigorous testing trials such that it could, in good faith, adopt a choice of technology and commit to a schedule for ALI implementation.<sup>4</sup> Although ALLTEL has continued to both communicate with vendors and closely follow testing trials for various technologies through industry groups, until recently there has been little solid data to report on the development of ALI technology. Consequently, it is imperative, in ALLTEL's judgement, that a competitive environment for ALI technology be maintained in which various ALI technologies can continue to evolve and provide carriers, PSAPs and consumers alike with the option to deploy the best ALI technology in the most expeditious and cost effective manner.

The Commission is to be commended for reassessing the technological and competitive neutrality of Section 20.18 of its rules, particularly with respect to handset based technologies.<sup>5</sup> In ALLTEL's view, the Commission should not either explicitly or tacitly (through a combination of compliance deadlines<sup>6</sup> and accuracy standards) skew the competitive landscape for ALI technology. Yet, under the current regulatory environment, this is precisely the prospect faced by carriers. Both industry and the Commission must be directed to providing the most accurate and efficient ALI technology at the earliest possible time. Currently, however, no ALI solution is perfect

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<sup>4</sup> ALLTEL notes that numerous carriers were apparently of the same mind and either chose not to seek waivers at that time or filed comments. See for example, Comments of AT&T Wireless Services, Inc. in response to DA 98-2631, filed February 4, 1999.

<sup>5</sup> While it would have been ALLTEL's preference to resolve the issue within the context of the pending rulemaking, as opposed to a premature waiver process, the waiver requests have proven to be the best vehicle to keeping a handset option before the Commission.

<sup>6</sup> ALLTEL fully acknowledges the pressing need to expeditiously deploy ALI technology, but is constrained to note that the October, 2001 deadline at the time of its adoption had little support and was not fully justified by the demonstrated status of ALI technology.

and the Commission is left to make the best judgement it can given the status of E-911 Phase I,<sup>7</sup> the state of current ALI technology, prospective penetration rates for new handsets and the promise for future innovations. Accordingly, ALLTEL believes carriers should be afforded the latitude to implement the most promising technology of their choice without the burden of meeting the onerous quid pro quo of overly aggressive handset deployment schedules.<sup>8</sup>

ALLTEL believes that handset-based technology holds the most promise, given its greater accuracy in most conditions, the ongoing migration of subscribers to digital systems and what appears to be an increasing market based demand for location technology. ALLTEL does not endorse either RMS or CEP methodology, but it shares the Commission's concern that RMS calculations may be too easily skewed by the inclusion of a small number of grossly inaccurate measurements. Further, RMS methodology does not appear to permit carriers to account for situations where a location fix cannot be obtained (other than Phase I location information). CEP, on the other hand, does not suffer from the deficiencies associated with RMS and remains a technology-neutral methodology. Consequently, while ALLTEL does not endorse any particular accuracy standard, to the extent the Commission revisits the standard issue, ALLTEL's preference would be for a standard based upon CEP.

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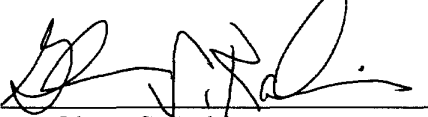
<sup>7</sup> While the Commission is attempting to resolve ALI issues for Phase II, it has yet to provide for broad based deployment of Phase I E-911 service, the necessary prerequisite for Phase II. The Commission, however, is to be commended for its efforts to promote Phase I implementation (See Public Notice, Commission Seeks to Facilitate Wireless E-911 Implementation and Requests a Report, FCC 99-132 (released June 9, 1999).

<sup>8</sup> ALLTEL has not yet been able to secure a commitment from its vendors, which would permit it to comply with either the SNAP-TRACK or APCO deployment schedules. Further, ALLTEL respectfully observes that the Commission's own CPNI rules, by treating handsets as CPE and therefore distinct from the underlying CMRS service, present a substantial obstacle to a carrier's efforts to market new GPS capable handsets to existing subscribers.

ALLTEL looks forward to participating in the Commission's scheduled roundtable on ALI, and reserves the right to further address matters respecting ALI implementation in its reply comments in this matter.

Respectfully submitted,

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